

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
OTIS ROBINSON	:	VIOLATIONS:
STEPHANIE VILLAREAL	:	18 U.S.C. § 1029(b)(2) (conspiracy - 1
VERIE TANN	:	count)
CORINDA SALVI	:	18 U.S.C. § 1029(a)(2) (use of
KIMBERLY HENRY	:	unauthorized access device - 9 counts)
		18 U.S.C. § 1029(a)(1) (use of counterfeit
		access device - 1 count)
		18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Wharton School at the University of Pennsylvania in Philadelphia offered a program called the Wharton School's Executive Masters of Business Administration Program ("WEMBA"). Students in WEMBA are business executives from throughout the country who spend weekends in Philadelphia, pursuing their MBA degrees. While doing so, they can stay at the University's Steinberg Conference Center, at their own expense.
2. Additionally, business groups sometimes use the Steinberg Center to conduct professional courses. Persons attending these courses can stay at the Steinberg Center, charging their lodging to a credit card.
3. Defendant STEPHANIE VILLAREAL was employed at the Steinberg Center in the Wharton School at the University of Pennsylvania campus in Philadelphia. As part

of her duties at the Steinberg Center, defendant VILLAREAL would check-in persons staying at the Steinberg Center, charging their lodging to their credit cards.

4. From in or about August 2003, to in or about September 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**OTIS ROBINSON,
STEPHANIE VILLAREAL,
VERIE TANN,
CORINDA SALVI, and
KIMBERLY HENRY**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and with intent to defraud, use and traffic in counterfeit and unauthorized credit cards in violation of Title 18, United States Code, Sections 1029(a)(1) and (2).

MANNER AND MEANS

It was part of the conspiracy that:

5. At the request of defendant OTIS ROBINSON, defendant STEPHANIE VILLAREAL stole credit card numbers of persons who had checked into the Steinberg Center. Defendant VILLAREAL gave these numbers to defendant ROBINSON on sheets of paper which contained the account numbers of several persons.

6. Defendant OTIS ROBINSON then had counterfeit credit cards manufactured using the stolen account numbers. These counterfeit cards had the stolen account numbers of persons who had stayed at the Steinberg Center, but bore the names of defendants KIMBERLY HENRY, VERIE TANN, and CORINDA SALVI.

7. Defendants OTIS ROBINSON, KIMBERLY HENRY, VERIE TANN, and CORINDA SALVI then used the counterfeit cards and account numbers to make purchases and pay bills.

OVERT ACTS

In furtherance of the conspiracy, the defendants, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or about the summer of 2003, defendant OTIS ROBINSON obtained from defendant STEPHANIE VILLAREAL stolen credit card account numbers of persons staying at the Steinberg Center.

2. In or about August 2003, following instructions from defendant OTIS ROBINSON, defendant KIMBERLY HENRY bought a computer for defendant ROBINSON from the Best Buy store in Willow Grove, Pennsylvania. Defendant ROBINSON gave defendant HENRY a counterfeit credit card in her name but with the true MasterCard account number of victim A.K. (last four digits 9454). Defendant HENRY purchased the computer for approximately \$1,642 as instructed and gave it to defendant ROBINSON.

3. In or about August 2003, defendant KIMBERLY HENRY used the counterfeit card in her name but with the true Master Card account number of victim A.K. (last four digits 9454) to purchase sneakers for her child costing approximately \$35 from a store in Willow Grove, Pennsylvania; to purchase clothing costing approximately \$475 for herself and a friend from a store in Willow Grove, Pennsylvania; and to purchase body lotions and other such

items costing approximately \$136 for herself and a friend from a store in Willow Grove, Pennsylvania.

4. In or about August 2003, defendant OTIS ROBINSON used the credit card account number of victim I.K. (last four digits 0821) to obtain a flat screen HDTV costing approximately \$2,012 from a store in Willow Grove, Pennsylvania.

5. In or about August 2003, defendant OTIS ROBINSON used the credit card account number of victim L.J. (last four digits 0602) to purchase another flat screen HDTV and a Play Station 2 and Play Station game, all costing approximately \$1,721, from a store in Willow Grove, Pennsylvania.

6. In or about September 2003, defendant OTIS ROBINSON used a credit card in the name of defendant KIMBERLY HENRY but with the with the true JP Morgan Chase MasterCard account number of victim P.B. (last four digits 9707) to purchase a 42-inch plasma HDTV, a 23-inch LCD TV, a TV stand, and a warranty, all costing approximately \$7,279, from a store in Willow Grove, Pennsylvania.

7. In or about September 2003, following instructions from defendant OTIS ROBINSON, defendant VERIE TANN bought pet supplies for defendant ROBINSON from Pets Plus, a pet store in Philadelphia, Pennsylvania. Defendant ROBINSON gave defendant TANN a counterfeit card in her name but with the true Citigroup credit card account number of victim C.M. (last four digits 4713). Defendant TANN bought the pet supplies for approximately \$1,099 as instructed by defendant ROBINSON and provided them to him.

8. In or about September 2003, defendant VERIE TANN attempted to use the counterfeit card, which was in her name but with the true Citigroup credit card account

number of victim C.M. (last four digits 4713), to buy items for herself costing approximately \$1,118.85 from a Target store in Philadelphia.

9. In or about September 2003, defendant CORINDA SALVI used a counterfeit credit card in her name but on the true Citigroup Visa credit card account number of victim T.S. (last four digits 7889) to buy items for herself costing approximately \$93 from an AutoZone store in Philadelphia.

10. In or about September 2003, defendant CORINDA SALVI attempted to use the counterfeit credit card in her name but on the true Citigroup Visa credit card account number of victim T.S. (last four digits 7889) to purchase items costing approximately \$606 from a Wal-Mart store in Philadelphia, Pennsylvania.

11. In or about September 2003, defendant OTIS ROBINSON solicited defendant CORINDA SALVI to buy pet supplies costing approximately \$473 for him from a pet store in Philadelphia, and gave her a counterfeit card in her name but on the true Bank One account of victim R.C. (last four digits 1278). Defendant SALVI bought the supplies as requested.

All in violation of Title 18, United States Code, Section 1029(b)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. On or about August 24, 2003, in Willow Grove, in the Eastern District of Pennsylvania, and elsewhere, defendants

**OTIS ROBINSON
and
KIMBERLY HENRY**

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a credit card in the name of defendant KIMBERLY D. HENRY but with the true MasterCard account number of victim A.K. (last four digits 9454), to obtain things of value aggregating \$1,000 or more, that is at least approximately \$2,343.34, during a one-year period, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. On or about August 28, 2003, in Willow Grove, in the Eastern District of Pennsylvania, and elsewhere, defendant

OTIS ROBINSON

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a Visa account number of victim I.K. (last four digits 0821), to obtain things of value aggregating \$1,000 or more, that is at least approximately \$2,012.93, during a one-year period, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.

2. On August 28, 2003, in Willow Grove, in the Eastern District of Pennsylvania,
and elsewhere, defendant

OTIS ROBINSON

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a MasterCard account number of victim L.J. (last four digits 0602), to obtain things of value aggregating \$1,000 or more, that is at least approximately \$1,721.41, during a one-year period, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. On or about September 1, 2003, in Willow Grove, in the Eastern District of Pennsylvania, and elsewhere, defendant

OTIS ROBINSON

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a credit card in the name of defendant KIMBERLY HENRY but with the true MasterCard account number of victim P.B. (last four digits 9707), to obtain things of value aggregating \$1,000 or more, that is at least approximately \$7,292.76, during a one-year period, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. On or about September 6, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**OTIS ROBINSON
and
VERIE TANN**

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a credit card in the name of defendant VERIE D. TANN but with the true MasterCard account number of victim C.M. (last four digits 4713), to obtain things of value aggregating \$1,000 or more, that is at least approximately \$1,099.90, during a one-year period, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. On or about September 6, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**OTIS ROBINSON
and
VERIE TANN**

knowingly and with the intent to defraud attempted to use, and aided and abetted and willfully caused the attempted use of, an unauthorized access device, that is, a credit card in the name of defendant VERIE D. TANN but with the true MasterCard account number of victim C.M. (last four digits 4713), to obtain merchandise and other things of value aggregating \$1,000 or more, that is at least approximately \$1,118.85, during a one-year period, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. On or about September 11, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**OTIS ROBINSON
and
CORINDA SALVI**

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, a counterfeit access device, that is, a counterfeit credit card in the name of defendant CORINDA SALVI but with the true Citigroup Visa account number of victim T.S. (last four digits 7889), thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. On or about September 11, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**OTIS ROBINSON
and
CORINDA SALVI**

knowingly and with the intent to defraud attempted to use, and aided and abetted and willfully caused the attempted use of, a counterfeit card in the name of defendant CORINDA SALVI, but with the true Citigroup Visa credit card account number of victim T.S. (last four digits 7889), thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1), (b)(1) and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. On or about September 20, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

OTIS ROBINSON

knowingly and with the intent to defraud aided and abetted and willfully caused the use of, an unauthorized access device, that is, a counterfeit card in the name of defendant CORINDA SALVI but with the true Bank One Visa credit card account number of victim R.C. (last four digits 1278), thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 3 and 5 through 7 of Count One are realleged here.
2. From on or about September 11, 2003, through on or about October 17, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

OTIS ROBINSON

knowingly and with the intent to defraud used unauthorized access devices, that is, the Visa credit card account number of victim D.B. (last four digits 2136) and the MasterCard account number of victim J.J. (last four digits 1066), to pay utility and telephone bills and thereby obtain things of value aggregating \$1,000 or more, that is at least approximately \$1,710.65, during a one-year period, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY